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2 Acting United States Attorney  
3 District of Nevada  
4 SUSAN CUSHMAN  
5 Assistant United States Attorney  
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Las Vegas, Nevada 89101  
702-388-6336

6 UNITED STATES DISTRICT COURT  
7 DISTRICT OF NEVADA

-oOo-

8 UNITED STATES OF AMERICA, )  
9 Plaintiff, ) Case No.: 2:16-cr-080-APG-NJK  
10 vs. )  
11 JOHN PATRICK FLAHERTY, ) AMENDED STIPULATION TO EXTEND  
12 Defendant. ) DEADLINES  
13

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14 IT IS HEREBY STIPULATED AND AGREED, by and between STEVEN W. MYHRE,  
15 Acting United States Attorney, and SUSAN CUSHMAN, Assistant United States Attorney, and  
16 HEIDI OJEDA, counsel for the defendant, that the deadline for the government to respond to  
17 defendant's Motion to Dismiss Counts One and Two of the Indictment (Dkt. # 33) be extended  
18 from December 22, 2017, to January 5, 2018, and defendant's reply be extended to January 10,  
19 2018.

20 This stipulation is entered into for the following reasons:

21 1. Counsel for the government will be in trial beginning on December 18, 2017, before  
22 United States District Court Judge Kent J. Dawson in *United States v. Jack William*  
23 *Morgan*, 2:17-cr-0064-KJD-GWF. That trial should conclude no later than December  
24 22, 2017.

2. On November 7, 2017, a stipulation to continue the trial date for at least 60 days was filed (Dkt. # 32).
3. Defendant is not incarcerated and does not object to the extension.
4. Both parties agree to the extension of deadlines.
5. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for the government sufficient time to research and respond to defendant's motion.

Dated this 13th day of December, 2017.

Respectfully Submitted,

STEVEN W. MYHRE  
Acting United States Attorney

/s/ Susan Cushman  
SUSAN CUSHMAN  
Assistant United States Attorney

/s/ Heidi Ojeda  
HEIDI OJEDA  
Counsel for Defendant Flaherty

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2           **UNITED STATES DISTRICT COURT**

3           **DISTRICT OF NEVADA**

4           -oOo-

5       UNITED STATES OF AMERICA,    )

6    ) Case No.: 2:16-cr-080-APG-NJK

7    )

8    ) Plaintiff,

9    )

10    ) vs.

11    )    )

12       JOHN PATRICK FLAHERTY,    )

13    )

14    ) Defendant.

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18           Based on the pending Stipulation of counsel, and good cause appearing therefore, the  
19           Court hereby orders that the United States' response is due on January 5, 2018.  
20           Any reply is due January 10, 2018.

21           The United States filed two stipulations regarding this matter, both of which were  
22           deficient, for reasons including failure to comply with LR IA 6-2, an inadequately-  
23           worded proposed order, and an incorrect signature line. The Court has, nonetheless,  
24           signed the United States' proposed order, despite the modifications required. Any  
         future deficient stipulations will be summarily denied.

26           IT IS SO ORDERED.

27           DATED: December 13, 2017

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